

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Thomas Vanaskie
(Ret.), Special Discovery
Master

**THE ZHP PARTIES' MOTION TO SEAL EXHIBITS TO PLAINTIFFS'
MOTION TO COMPEL PURSUANT TO LOCAL CIVIL RULE 5.3(c)**

Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. ("ZHP"), Princeton Pharmaceutical Inc. ("Princeton"), Huahai U.S. Inc. ("Huahai U.S.") and Solco Healthcare U.S., LLC ("Solco", and collectively with ZHP, Huahai U.S., and Princeton, "the ZHP Parties"), by and through their counsel, respectfully move, pursuant to Local Civil Rule 5.3(c), to seal the following documents filed as Exhibits 4-10 and 14-16 to Plaintiffs' Plaintiffs' Motion to Compel the ZHP Parties' Supplemental Production (the "Motion to Compel") dated July 23, 2021 (ECF. No. [1405](#)).

1. ZHP02471924 (ECF No. [1405](#), Ex. 4);
2. ZHP02734637 (ECF No. [1405](#), Ex. 5);

3. ZHP02490581 (ECF No. [1405](#), Ex. 6);
4. ZHP02735368 (ECF No. [1405](#), Ex. 7);
5. ZHP02731217 (ECF No. [1405](#), Ex. 8);
6. ZHP00180427 (ECF No. [1405](#), Ex. 9);
7. ZHP02628144 (ECF No. [1405](#), Ex. 10);
8. ZHP02710347 (ECF No. 1405, Ex. 14);
9. ZHP02710344 (ECF No. [1405](#), Ex. 15);
10. ZHP02710242 (ECF No. [1405](#), Ex. 16).

Likewise, Plaintiffs have redacted a sentence of their Motion to Compel that discloses confidential information contained in Exhibits 14-16. *See* Mot. to Compel at 1, 9 (ECF No. [1405](#)).¹ Because the ZHP Parties seek to seal Exhibits 14-16 in their entirety, for the same reasons described herein, the ZHP Parties respectfully seek to maintain that redaction.

In support of this motion, the ZHP Parties rely upon the Declaration of Kelly Bonner, Esq., dated October 12, 2021 (the “Bonner Declaration”), and the Declarations of Mi Xu, dated October 12, 2021 (the “Xu Declaration”) and Dr. Min

¹ Plaintiffs have redacted approximately two sentences that disclose confidential information related to the July 27, 2017 email. *See* Plaintiffs’ Motion to Compel at 1, 5 (ECF No. [1405](#)). Because the confidentiality of the July 27, 2017 email and consequently, these sentences, are the subject of two pending motions—ECF Nos. [1392](#) and [1584](#)—the ZHP Parties respectfully request that the Court maintain Plaintiffs’ redactions until the Court renders its decision(s).

Li, dated October 12, 2021 (the “Li Declaration”). A proposed form of Order, including Proposed Findings of Fact and Conclusions of Law pursuant to Local Civil Rule 5.3(c)(6), is also submitted herewith.

Pursuant to Local Civil Rule 7.1(d)(4), no legal brief is required because the relevant proposed findings of fact and conclusions of law required by Local Civil Rule 5.3(c)(2) are contained in the Proposed Order and supported by the Bonner, Xu, and Li Declarations, which describe with particularity: (a) the nature of the exhibits to be sealed; (b) the legitimate private interests which warrant sealing the exhibits; (c) the clearly defined and serious injury that would result if the exhibits were not sealed as proposed; (d) why less restrictive alternatives to sealing the exhibits are not available; (e) any prior Order sealing the exhibits; (f) the identity of any party or nonparty known to be objecting to the sealing request; (g) the materials to which there is an objection; (h) the basis for the objection; and (i) whether the material or information sought to be sealed was previously sealed by the Court in the pending action, and (j) why the materials should be maintained under seal.

Dated: October 12, 2021

Respectfully submitted,

/s/ Seth A. Goldberg
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